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12 UNITED STATES DISTRICT COURT

13 DISTRICT OF NEVADA

14 RAMON MURIC-DORADO,

15 Plaintiff,

16 vs.

17 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, et al.

18 Defendants.

CASE NO.: 2:18-cv-01184-JCM-EJY

**STIPULATION TO EXTEND
DISPOSITIVE MOTION DEADLINE
(Fourth Request)
[ECF No. 253]**

19 The parties by and through their respective counsel, hereby stipulate, agree, and request
20 that this Court extend the dispositive motion deadline from the current date of July 16, 2025, for
21 sixty (60) days, until **September 15, 2025**, and to set a deadline for responses to all dispositive
22 motions of **October 14, 2025**. This extension and corresponding response deadline will allow the
23 parties sufficient time to prepare and file numerous dispositive motions, and the responses to them.

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1 **I. DISCOVERY COMPLETED TO DATE**

2 As set forth in the parties' prior requests to extend this deadline at ECF Nos. 249, 252, and
3 254, the parties conducted substantial discovery in this matter. Discovery closed on February 14,
4 2025, and is completed.

5 **II. DISCOVERY YET TO BE COMPLETED**

6 Discovery is completed. The parties are requesting an extension of the current dispositive
7 motion and corresponding response deadlines only.

8 **III. REASONS WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

9 The parties are requesting a sixty (60) day extension of the current dispositive motion
10 deadline. On June 24, 2025, the parties requested a thirty (30) day extension of the current
11 deadline. [ECF No. 254]. That request was timely and in advance of the July 16, 2025, deadline.
12 The Court has not ruled on the pending Stipulation. As such, this Request is being made after the
13 operative deadline. However, the parties submit that because of the filing of the timely Stipulation
14 at ECF No. 254, excusable neglect is shown.

15 LR 26-3 states in relevant part:

16 A motion or stipulation to extend a deadline set forth in a discovery plan
17 must be received by the court no later than 21 days before the expiration of
18 the subject deadline. A request made within 21 days of the subject deadline
19 must be supported by a showing of good cause. A request made after the
expiration of the subject deadline will not be granted unless the movant also
demonstrates that the failure to act was the result of excusable neglect.

20 In evaluating excusable neglect, the court considers the following factors: (1) the reason
21 for the delay and whether it was in the reasonable control of the moving party, (2) whether the
22 moving party acted in good faith, (3) the length of the delay and its potential impact on the
23 proceedings, and (4) the danger of prejudice to the nonmoving party. *See Pioneer Inv. Servs. Co.*
24 *v. Brunswick Assocs.*, 507 U.S. 380, 395 S. Ct. 1489, 123 L.Ed.2d 74 (1993). The parties attempted

1 to seek a timely extension of this deadline.

2 There are now eighteen (18) named Defendants in this matter. Recently, on July 3, 2025,
3 this Court dismissed three (3) Defendants following the parties' agreement. [ECF No. 257]. On
4 June 25, 2025, eight (8) of the named Defendants filed a dispositive motion related to the claims
5 against them. [ECF No. 256]. On July 18, 2025, another dispositive motion was filed by another
6 three (3) Defendants. [ECF No. 258]. There are seven (7) remaining Defendants that will file
7 dispositive motions.

8 Defendants have been diligent in preparing and filing dispositive motions as shown above.
9 However, due to the number of claims and named Defendants in this matter, more time is needed.
10 Likewise, because there will be multiple dispositive motions filed, Plaintiff will need additional
11 time to file the appropriate responses. As such, there is good cause to extend the dispositive motion
12 deadline and corresponding deadline for responses.

13 **IV. PROPOSED EXTENDED DEADLINES**

14 The Parties respectfully request this Court enter an order as follows:

15 Deadline	Current Date	Proposed New Date
16 Dispositive Motion Deadline	July 16, 2025	September 15, 2025
17 Response to Dispositive Motions	14 days after filing of Motion	October 15, 2025 for all Motions filed
18 Pre-Trial Order Deadline	September 15, 2025	November 15, 2025

20 **A. Motions in Limine/*Daubert* Motions.**

21 Under LR 16-3(b), any motions in limine, including *Daubert* motions, shall be filed and
22 served 30 days prior to the commencement of Trial. Oppositions shall be filed and served and the
23 motion submitted for decision 14 days thereafter. Reply briefs will be allowed only with leave of
24 the Court.

1 **B. Extensions or Modification of the Discovery Plan and Scheduling Order.**

2 In accordance with LR 26-3, applications to extend any date set by the discovery plan,
3 scheduling order, or other order must, in addition to satisfying the requirements of LR 6-1, be
4 supported by a showing of good cause for the extension. All motions or stipulations to extend a
5 deadline set forth in a discovery plan shall be received by the Court not later than 21 days before
6 the expiration of the subject deadline. A request made after the expiration of the subject deadline
7 shall not be granted unless the movant demonstrates that the failure to set was the result of
8 excusable neglect. Any motion or stipulation to extend a deadline or to reopen discovery shall
9 include:

- 10 (a) A statement specifying the discovery completed;
- 11 (b) A specific description of the discovery that remains to be completed;
- 12 (c) The reasons why the deadline was not satisfied or the remaining discovery was not
13 completed within the time limits set by the discovery plan; and
- 14 (d) A proposed schedule for completing all discovery.

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This request for an extension is made in good faith and joined by all the parties in this case. The Request is not timely; however, excusable neglect is shown. Trial is not yet set in this matter. Accordingly, this extension will not delay this case. Moreover, since this request is a joint request, neither party will be prejudiced. The extension will allow parties the necessary time to file dispositive motions and the respective responses.

DATED this 24th day of July, 2025.

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DATED this 24th day of July, 2025.

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Christopher Hunter, Douglas Taylor and
Mitchell Green***

IT IS SO ORDERED.

Dated this 25th day of July, 2025.


UNITED STATES MAGISTRATE JUDGE